

**IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF MISSOURI**

**In re:**

**WEST 160 SCRAP & SALVAGE, LLC**

**Debtor.**

Case #14-61498

Chapter 11

**MOTION FOR ORDER SHORTENING TIME FOR NOTICE OF OPPORTUNITY TO  
RESPOND OR OBJECT TO MOTION TO EMPLOY AUCTIONEERS AND TO SELL  
FREE AND CLEAR OF LIENS**

For its Motion for Order Shortening Time to Respond, Debtor states as follows:

1. Debtor filed its voluntary petition under Chapter 11 on November 10, 2014.
2. Debtor has now filed a Motion to Employ Auctioneers to sell its business equipment, and sell property free and clear of liens, with creditor liens attaching to the proceeds.
3. As part of the sale process, the auctioneers will deposit \$400,000 with debtor's counsel as a guaranty against the sale proceeds being sufficient to pay secured claims.
4. Debtor is of the opinion that this sum will pay creditors holding security interests in the property to be sold the principal amounts of their claims, thus avoiding litigation as to values.
5. There are less than 10 creditors holding security interests in the equipment.
6. The sale season is beginning and it is important to hold the sale early in the selling season.
7. Debtor respectfully request that the time to respond to the motions pending to employ Auctioneers, and to sell free and clear of liens be reduced to ten (10) days from the date of service.
8. This period of time will be more than adequate to enable creditors, if they choose, to

file objections or otherwise respond to the Motions.

9. Shortening time will not result in prejudice to any party.

**Respectfully submitted,**

**BERMAN, DeLEVE, KUCHAN & CHAPMAN, LLC**

By /s/ Joel Pelofsky

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**ATTORNEY FOR DEBTOR and DEBTOR-IN-POSSESSION**

**CERTIFICATE OF SERVICE**

I certify that the foregoing Motion was electronically filed with the Clerk of the Bankruptcy Court on this 24th day of March, 2015 and was served electronically on those parties receiving electronic notice through the Court's CM/ECF system.

/s/ Joel Pelofsky  
Joel Pelofsky, MO #17929  
Attorney for Debtor